



Anne K. Bingham
Senior Vice President
President, Local
Telecommunications Division

May 23, 1997

VIA FAX

Mr. Neil Cox
President
Ameritech Information Industry Services
350 North Orleans, Floor Three
Chicago, IL 60654

Dear Neil:

Thank you very much for coming to Washington for the lunch yesterday. It cleared the air and I sincerely appreciate your having taken the initiative to set it up and taking the time to come here for the meeting.

Of the several major issues noted in my May 22, 1997 letter, the most urgent and pressing is our desire to gain hands-on and practical experience for our engineering and process people in the OSS and backoffice systems needed to make the Unbundled Network Element (UNE) platform operational. As I told you, and as the large exchange of letters between me and Ed Wynn reflects, we have been trying for three months to get that done. I was relieved to hear you say that in fact Ameritech is currently conducting exactly such a test with AT&T. I would greatly appreciate it if we could be included in that test, so that our engineering people could gain the same experience as AT&T is gaining. I realize you said that the reason we had not been included in the test to date was because of a lack of engineering staff on Ameritech's part to conduct more than one trial simultaneously. Being mindful of that, we would endeavor to learn without putting additional demands on your engineering and backoffice organizations. But it is absolutely critical for LCI to learn and have access to the network platform if we are to compete effectively.

I also appreciate your ready response by removing Mr. O'Sullivan as our account manager because of the difficulties we have experienced since October. On the contract issues, I will be in touch with you shortly to work through what information you could give us on the embedded base on the long term contracts, which causes such problems in marketing.

Ex 113

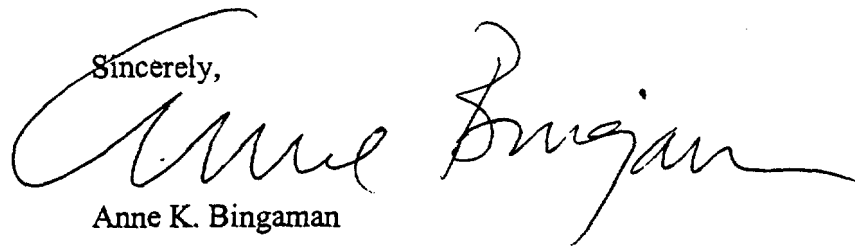
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Thanks again for the meeting. We very much want to be included in the AT&T test. My desire is to gain operational experience, not to sue Ameritech, and I think it is much more productive of the time of both of our organizations to take the route you indicated yesterday, which is to let us share in the AT&T test that is ongoing, rather than posture with Ameritech's lawyers as a prelude to litigation.

I look forward to speaking to you further about all of this, and especially to participating promptly in the ongoing AT&T test, which I had not known of before yesterday.

Thank you very much.

Sincerely,

A handwritten signature in cursive script, reading "Anne K. Bingaman". The signature is fluid and extends across the right side of the page.

Anne K. Bingaman

AKB:slg

**STATEMENT BEFORE
FEDERAL COMMUNICATIONS COMMISSION
OPEN FORUM REGARDING OSS**

by
ANNE K. BINGAMAN
Senior Corporate Vice President
LCI International
President, Local Telecommunications Division

May 28, 1997

Ex. 14

Good morning. It is an honor to be here, and I sincerely commend the Commission and its Common Carrier Bureau for convening the Open Forums on these critical OSS issues.

What I have to tell the Commission and the Bureau today is that there is a firestorm raging in the telecommunications industry. The firestorm is called OSS, and it is literally consuming us all -- ILECs, CLECs, consumers and potential CLEC customers alike. The OSS deadline of January 1, 1997 is now fully five months behind us. Yet OSS problems remain serious; they are fundamental; and they are across the board. No ILEC¹ is immune, and no ILEC is even close to being in compliance with the Commission's August 1, 1996 Local Competition Order.

Let me give a brief overview of where we are first in the comparatively simple resale environment, and then in the vitally important unbundled network element (UNE) environment, so central to the Commission's goals and to the Telecommunications Act of 1996. I am sorry to have to report that gaping deficiencies exist in resale. As to the all-important OSS for UNEs, progress is so minimal as to be non-existent. The industry needs the Commission to act, and act now, to help the industry and American consumers with this vital issue.

I. OVERVIEW OF OSS PROBLEMS IN THE RESALE ENVIRONMENT

First, even as to simple resale, the fundamentals for competition at parity with ILECs by competitors are simply missing.

¹ As used herein, "ILEC" refers to the RBOCs and GTE. (Sprint is a member of the LCUG, the Local Competition Users' Group, which espouses established performance standards. Other members of LCUG are AT&T, MCI, LCI and WorldCom.)

Ameritech

As an example, let me cite LCI's experiences with Ameritech, generally considered, I understand, to be further ahead in OSS issues than other ILECs. Yet, as LCI's staff has documented to Ameritech throughout the Winter of 1997 and, as I told Neil Cox, the President of Ameritech Information Industry Systems in a meeting and letter on May 22, 1997, LCI is receiving usage data three to seven days late, while Ameritech receives it immediately. [See Ex. A] Even for simple resale, LCI cannot bill its customers in a timely fashion. For monthly usage data, including monthly recurring charges and non-recurring charges, Ameritech is weeks behind schedule, chronically, despite our best efforts to get them to file timely reports.^{2 3} The customers, of course, do not understand that it is not LCI's fault that items appear on their bills which are two months old, nor do they understand why the bill is five to seven days behind, with huge gaps between the date a charge was incurred and the date the bill is sent. We simply

² While Ameritech should be providing this data within 24 or at most 36 *hours* after a call has been recorded at the switch, for approximately 99% of the calls made by LCI customers in Illinois, Ameritech is not providing the information to LCI concerning those calls until 3-7 *days* after the call was made. [See Ex. B, Marlin Aff., submitted to the Illinois Commerce Commission, April 22, 1997]

³ Timely AEBS data is critical to billing time and materials charges that are passed through to customers. Since our resale relationship began late last year, LCI has received billing data from Ameritech's AEBS system only sporadically as follows:

November data was received via tape on 1-6-97
December data was received via tape on 1-14-97
January data was received via Connect:Direct on 3-1-97
February data was received via Connect:Direct on 3-26-97
March data was received via Connect:Direct on 4-17-97
April data was received via Connect:Direct on 5-16-97

[See Ex. C]

cannot provide customers with the same quality or level of billing, because Ameritech does not provide it to us. [See Ex. A]

On USOC codes as well, Ameritech has been inconsistent and vague. It adds USOC codes, takes down the Website for up to a month where they are listed, and does not give LCI the same access its own sales people have to USOC codes. While this may seem like a minor complaint, in fact accurate USOC codes are at the heart of the ordering process. There are approximately 10,000 USOC codes; and they are different by RBOC and by metropolitan area, and differ as well according to whether the service is residential or business. They are written in what appears to be Greek, not English, with unintelligible letters jammed together with no spaces. Each separate USOC code represents a different service. It is absolutely crucial to the integrity of LCI's orders that every single letter in every single USOC code be correct, or the order will be rejected. [See Ex. D] LCI's repeated requests for equal access to Ameritech's USOC codes have been met with indifference.

Obtaining accurate and timely customer service records is the crucial first step in transitioning customers from an RBOC to LCI, yet LCI has encountered substantial difficulties in receiving CSRs as well. Several RBOCs with whom LCI does resale business (Bell South and PacBell) produce customer service records (CSRs) only on media that prevent LCI from electronically manipulating the data, unless LCI completely rekeys the information into its own computers. Rekeying this information increases the error rate and increases the risk that customer service will be turned up incorrectly.

While Ameritech will provide CSRs electronically, these CSRs unfortunately are in free-form text. This requires LCI and other CLECs to develop sophisticated parsing routines to interpret the many different formats. These systems must be developed in a trial-and-error fashion due to the lack of specifications and documentation on the free-form text. Moreover, the format of the CSRs varies from one RBOC to another, and some RBOCs, including Ameritech, have multiple CSRs within a single state, making it even more difficult to standardize preordering software and to develop preordering procedures.

State agencies reviewing Ameritech's OSS have come to the same conclusions as LCI as to the state of Ameritech's OSS readiness.

As the Illinois Commerce Commission Hearing Examiner concluded in March, 1997, Ameritech is not currently providing CLECs with nondiscriminatory access to its OSS. And, until Ameritech presents "empirical evidence that Ameritech's OSS are operational and functional," Ameritech will not be found to be providing nondiscriminatory access to its OSS. [See Ex. E, Illinois Proposed Order at 28] Thus, "Ameritech must ensure the connecting carriers have sufficient information of Ameritech's OSS, including working with carriers that experience rejected orders and/or orders that require manual intervention" and "Ameritech must also show that carriers are able to utilize Ameritech's OSS in a sufficient manner that will accommodate the demand of a new LEC's services by end users." In short, "[a]t this point, we are not convinced that carriers will be able to offer its services to the general public with the expectation that all service orders will be processed."

After two days of hearings devoted exclusively to OSS issues, the Wisconsin Public Utilities Commission concluded unanimously in April, 1997 that Ameritech's OSS were neither sufficiently tested nor operationally ready. [See Ex. F, Wisconsin Order at 2-8] It found that, not only did many problems exist with Ameritech's systems, but that new problems were arising regularly, demonstrating that the systems were not stable, reliable or predictable.

The Wisconsin Public Utilities Commission directed its staff to draft an order regarding Ameritech's Statement of Generally Available Terms and Conditions (SGAT). The staff's draft order, published May 5, 1997, rejected Ameritech's SGAT and its supporting testimony of Rogers, declaring that "Ameritech's Operations Support Systems (OSS) are not tested and operational." Ibid.

The Michigan Public Service Commission, the only commission to date to approve Ameritech's compliance, has just this week (for the first time) scheduled its own OSS hearings, to be held May 28, 1997 in Lansing, exactly coincident with these hearings. Thus, no findings have ever been made on OSS by the State of Michigan.

I have focused thus far on Ameritech, because of my understanding that it is perceived as being operationally ahead of the other ILECs. Other ILECs, unfortunately, are no better.

NYNEX

Just two weeks ago, on May 13, 1997, the Administrative Law Judge of the New York Department of Public Service reviewed the status of NYNEX's

SGAT, stating: "Following consideration of the record of the Technical Conference, the parties' briefs and reply briefs, and the informal discussions between parties and advisory staff," she declared: "Because of the shortcomings in this record, a recommendation to the Commission to approve the Statement is not feasible." [See Ex. G] [For an overview of LCI's experience, see Ex. G-2, Wajsgas Aff.]

At a technical conference conducted in April, 1997 by the New York Public Service Commission, prior to the ALJ's decision, NYNEX conceded myriad shortcomings⁴ in its providing adequate nondiscriminatory OSS functions.⁵

⁴ These included: (i) NYNEX currently cannot provide electronic notification of rejected orders [See Ex. H at 470]; (ii) CLECs cannot change or correct their orders electronically until a service order has been assigned [*ibid.* at 492]; (iii) CLECs cannot place "migration as specified" orders, which substantially increases their time and cost in placing orders to NYNEX [*ibid.* at 436]; (iv) CLECs cannot, through NYNEX's OSS, determine a customer's billing telephone number from the customer's working telephone number, while NYNEX's own retail service personnel can obtain such information [*ibid.* at 448-49]; and (v) NYNEX has not done any substantial testing of the operational capabilities of its OSS interfaces [*ibid.* at 442-43]. Others at that conference identified even more problems with NYNEX's OSS, including: (i) "[t]he trouble process has been very convoluted" -- "[i]t's been a combination of faxing, chasing down the appropriate repair personnel via phone and following through on the system like that," and "we are unable to enter trouble tickets into the GUI system" [*ibid.* at 388]; (ii) "there are still many orders you can put in that do not flow directly to NYNEX's Operating Support Systems" [*ibid.* at 389]; (iii) because "we only know working telephone numbers and not bill telephone numbers," "we are unable to access a customer's service record" [*ibid.* at 397]; (iv) where a reasonable response time for accessing various OSS information would be under 10 seconds, the "response time has been a minute and 40 seconds" [*ibid.* at 397-98]; (v) not only is the Web/GUI "not an electronic interface" [*ibid.* at 403], which in itself does not provide parity because it "requires dual entry" and "provides . . . no management reports" [*ibid.* at 434-35], there also "seemed to be areas of the GUI that were not functionally complete, scenarios that were not yet programmed into the GUI" -- "it was very poor support for being able to support multiple features on a single order and it is very cumbersome for the CLEC" and "[w]e experience a lot of error messages that we cannot interpret" [*ibid.* at 416]; (vi) there is a "lack of flow through capability," and "[w]ithout the flow through capability, which means you have manual intervention, all of these interface systems whether they are GUI, whether they are EIF or whether they are EDI are "fancy E-mail systems" [*ibid.* at 435].

⁵ As this Commission well knows, the FCC's commitment to the network platform and the availability of UNEs is the cornerstone of its entire regulatory scheme. The

Bell Atlantic

In LCI's experience, Bell Atlantic presents its own unique case. It has refused to enter into a resale agreement with LCI unless LCI agrees to keep all performance standards for OSS confidential. Indeed, Bell Atlantic would even have LCI seek permission from it before revealing to this expert agency or other government body LCI's experiences with Bell Atlantic's performance standards. [See Ex. I] LCI has strongly objected to this as an effort to stymie public debate of important issues. Indeed, Bell Atlantic's posture would deny this Commission and the department of Justice the right to publicly state their reasoning or views on OSS issues. On May 23, 1997, LCI, frustrated over weeks of lack of response on this issue, agreed to sign the EDI test agreement and resale agreement with the two disputed provisions as Bell Atlantic wanted, subject to LCI's right to challenge them before a government agency. [See Ex. J] No response has yet been received.

From the experience of others, it appears that Bell Atlantic still has a long way to go before it will be able to provide CLECs with workable and non-discriminatory access to its OSS.⁶

Commission affirmed the right to these unbundled combined network elements in paras. 332-41 of its August 1, 1996 Local Competition Order, properly reading the express language of Section 251(c)(3) of the 1996 Telecommunications Act.

⁶ Its OSS, including its ordering and billing interfaces, are not in a state of operational readiness [see Ex. K, Kirchberger Aff (AT&T witness before the Pennsylvania PUC at 2, 6], as even Bell Atlantic concedes [(citing a Bell Atlantic official's concession that, while Bell Atlantic has done the "initial development" of an ordering interface, "it will probably be several years . . . before all LSR [local service request] types are mechanized," and Bell Atlantic "is still 'conducting an operational test to validate the production capabilities of the billing system'")] *ibid.* Moreover, Bell Atlantic's proposed ordering procedure will require Bell Atlantic employees to "manually input [CLECs'] orders into Bell Atlantic's service ordering process systems." To make

BellSouth

BellSouth's problems with OSS are no different from other ILECs. On March 21, 1997, the Georgia Public Service Commission, "[b]ased on a thorough review of the entire body of evidence presented in the record and consideration of general regulatory policy issues," "finds as a matter of fact and concludes as a matter of law" that BellSouth "does not yet fully comply with all of the standards and requirements of Section 251 and 252(d) of the Act, and [its SGAT] therefore should be rejected." [See Ex. L, Georgia PSC Order at 2, 6] Specifically, the Georgia PSC concluded that, "[f]or unbundled access to network elements and for resale, BellSouth has not yet demonstrated that it is able to provide access to operational support systems ('OSS') on a nondiscriminatory basis that places CLECs at parity with BellSouth." [*ibid.* at 10]⁷

Southwestern Bell (SBC)

Although the Oklahoma Corporation Commission (OCC), in a split decision, approved SBC Communications' (SBC) section 271 application, the

matters worse, Bell Atlantic "has not even disclosed what OSS functions or interfaces are being tested, or what kinds of service order types, or volumes are involved." [*ibid.* at 10] Moreover, Bell Atlantic has not provided AT&T, with whom tests were to start in late March 1997, with "the OSS interfaces necessary for testing." [*ibid.* at 10]

⁷ The Georgia PSC explained as follows: "Nondiscriminatory access to operation support systems (OSS) is an integral part of providing access to unbundled network elements, as well as making services available for resale. The record shows that BellSouth has not yet demonstrated that it is able to fulfill these important aspects of the Statement's provisions on a nondiscriminatory basis that places CLECs at parity with BellSouth. [See Ex. L, Georgia Order at 28] "In addition, the pre-ordering and ordering interim 'web' interfaces, and the interfaces for maintenance and repair, are not projected to be fully operational for roughly two months"; "BellSouth is still working on an interface for Customer Records Information System ('CRIS') billing and for local usage data, both of which may not be ready for two months." [*ibid.* at 28-29] And, "[b]efore BellSouth can offer the interfaces for actual CLEC use, testing must be completed," and to a great extent, "testing has not begun." [Georgia Order at 29]

reality is, as the United States Department of Justice recently confirmed, SBC in Oklahoma has not provided the requisite OSS access. [See Ex. M, DOJ Evaluation at 24-25] The DOJ explained that: (i) “the OCC majority did not adopt detailed factual findings” and “their conclusions appear to rest, in large part, on what we believe to be an incorrect legal interpretation of the checklist”; and (ii) “[i]n contrast to the OCC’s limited view,” the administrative law judge, who found SBC to be lacking, also was supported by “the dissenting OCC Commissioner, the Oklahoma Attorney General, and the OCC staff”).

Specifically, the DOJ concluded not only that “SBC has not demonstrated that its wholesale support processes are sufficient to make resale services and unbundled elements practicably available when requested by a competitor,” “[i]ndeed, there is evidence in the record to suggest that SBC has thwarted CLEC attempts to test and commercially use the wholesale support processes SBC claims to provide,” and “has failed to demonstrate even through internal testing the operation of its automated processes for making resale services and unbundled elements meaningfully available.” [See Ex. M, DOJ Evaluation at 30] And, “[b]ecause none of SBC’s automated wholesale support processes are operational -- commercially or otherwise -- SBC cannot make a demonstration of reliable performance and establish performance measures to ensure reliable support service post-entry. More importantly, even if SBC’s processes were operating at some level, SBC has not established a sufficiently comprehensive set of performance standards, nor supplied its own retail performance information, to permit such a comparison.” [See Ex. M, DOJ Evaluation at 60-61]

PacBell

PacBell's problems with OSS are many and large. They were detailed first by me in a series of letters between Pacific Bell and myself following my comments at the Senate Commerce Committee hearing in March, 1997, that "competition is on the fax room floor at PacBell." [For a full set of that exchange see Ex. N.]

Just one month ago, LCI (and presumably others in the industry) received notice from PacBell that it could not expect PacBell to process more than 2,000-2,500 orders per day by the end of second quarter 1997. By the end of fourth quarter 1997, PacBell estimates it can complete only 5,000-6,000 orders per day. Its own customer base is in the tens of millions of lines, in California, a state with a total population of 31 million people. [See Ex. O]

Finally, in an incredible series of missteps just weeks ago, PacBell disconnected an LCI customer for five days because it could not manage the simple transition on an "as is basis" from PacBell to LCI resale. The series of letters between LCI and PacBell concerning this incident is attached hereto as Ex. P.

II. Unbundled Network Elements

The Commission should be aware that the entire construct in its Access Charge Decision -- relying on market forces to control access charges, and exempting unbundled network elements from access charge payments -- today simply is non-functional. As this Commission well knows, the FCC's commitment to the network platform and the availability of UNEs is the cornerstone of its

entire regulatory scheme. The Commission affirmed the right to these unbundled combined network elements in paras. 332-41 of its August 1, 1996 Local Competition Order, properly reading the express language of Section 251(c)(3) of the 1996 Telecommunications Act. Unless the Commission acts promptly and powerfully to drive this process, the entire regulatory edifice the Commission has constructed to support its various decisions in the Telecommunications Act will crumble. It is built upon what today can only be described as quicksand -- the purported availability of unbundled network elements (UNEs).⁸

It is simply a fact that if the track record of the ILECs in the resale environment has been poor, there is no track record in unbundled network elements. LCI has made efforts to institute tests with each ILEC with which it does business for unbundled combined network elements ("UNEs"), so that LCI could gain experience in the important OSS processes underlying them. LCI's experience with OSS for UNEs is set forth briefly below.

⁸ In this regard, although it does not deal with OSS specifically, let me highlight the critical importance of the Commission's transport decision pending now. If the Commission were to grant Ameritech's request on its views on common transport, it would drive a stake through the heart of any chance at the unbundled network element platform being successful. If that were to happen, the FCC's arduous efforts over the last year and a half would have been in vain, for there will be no way out of access charges, short of immediately becoming a full facilities-based carrier. That, of course, cannot happen overnight, even with all the money in the world. The short of it is that the Commission must deny Ameritech's position on the transport issues if the UNE platform is to remain viable, and it must immediately drive the ILECs to establish OSS for the UNE platform so that this procedure can work.

NYNEX

LCI met with NYNEX on March 25, 1997, and asked to order the UNE Platform first for its New York Sales office, and next for friendly customers. LCI was told frankly by Mr. Jack Goldberg, Vice President of NYNEX Wholesale Services, that LCI's test with NYNEX would be the first such test NYNEX had conducted and that NYNEX welcomed the opportunity to gain experience in this new field. [See Ex. Q] LCI continues to work cooperatively with NYNEX, but the test is not far advanced, and whatever comes out of it, the test is in no way, shape or form scaleable to commercial operations. NYNEX, as its Vice President of Wholesale Services readily admitted just two months ago, is simply brand new to OSS in the UNE environment.

Ameritech

LCI's experience with Ameritech has been one of long frustration, until just days ago. The saga began on February 28, 1997, when LCI met with Ameritech and sought to order the UNE platform, first for its Chicago and Detroit sales offices, and next for friendly customers in Michigan and Illinois. [For the complete exchange, see Ex. R-2] LCI's goal was to gain OSS experience in the UNE environment, so that it could take advantage of the network platform promptly. After three months of meetings and letters, in which Ameritech professed not to understand LCI's request, Mr. Neil Cox, President of Ameritech Industry Information Systems (AIIS) told me in a meeting on May 22, 1997 that the only reason Ameritech was not honoring LCI's request to order the network platform in Chicago and Detroit on a trial basis was because it was already

engaged in such a test with AT&T, and that he, Mr. Cox (who is in charge of all wholesale matters including unbundled network elements), simply did not have the resources available to conduct two engineering tests at once. [See Ex. R] If that is the case, LCI questions how Ameritech can possibly be prepared to meet the Department of Justice's comments to the Southwestern Bell application [see Ex. M at p. 28]:

Further, a RBOCs wholesale support processes must offer a level of functionality sufficient to provide CLECs with a meaningful opportunity to compete using resale services and unbundled elements. Thus in general, to satisfy the checklist wholesale support processes must be automated if the volume of transactions would, in the absence of such automation, cause considerable inefficiencies and significantly impede competitive entry. (emphasis added)

BellSouth, PacBell and Bell Atlantic appear to be even less far along. It is simply a fact, to the very best of LCI's knowledge, that no ILEC to date is even close to having any substantial experience whatsoever in providing OSS for unbundled network elements. This critical part of the Telecommunications Act is a gaping hole today, despite LCI's, and apparently others', best efforts to gain understanding and experience in it.

CONCLUSION

This brief history demonstrates the variety of problems facing CLECs today, as they struggle to complete on an equal footing with well-established, powerful monopolist competitors who are fully in control of their own computer systems, and fully able to process orders, send bills, and perform the basic services every telephone consumer has a right to expect without difficulty. It is simply a fact that competitors today cannot do this, even in the relatively simple

resale environment. This Commission's action is urgently needed to set performance standards so that competitors, CLECs and ILECs alike, and most importantly the consuming public, will have quick, speedy and final resolution of the problem of OSS standards.

The ILECs have refused or have been unable to provide the kind of data and measurement criteria that would be needed for the CLECs to determine if they are being provided parity of OSS access. [See, e.g., DOJ Evaluation at 60-61 ("[S]BC has not established a sufficiently comprehensive set of performance standards, nor supplied its own retail performance information, to permit such a comparison") and Friduss affidavit [Ex. M-2, attached to the DOJ filing]. In view of that vacuum, LCI asks this Commission to detail what would constitute a fully-functioning OSS accessible to competitors on an adequate basis. If an ILEC could meet these suggested criteria, it then reasonably can be assumed that parity has been achieved (or, if true parity of access has not been achieved, at least sufficient access will have been provided so that it can be assured that the CLECs have been provided a reasonable and adequate level of OSS functionality).

The Commission correctly has identified access to reasonable, adequate OSS functions of the ILECs on a nondiscriminatory, parity basis as an "essential," "absolutely necessary" predicate for CLECs to be able to compete in local telephone markets. In adopting LCI's suggestion that the Commission establish performance standards for OSS, the Commission would be providing heightened clarity that will benefit everyone in the industry, and ultimately -- and

most importantly -- the American consumer. Until ILECs meet their burden under Section 251 of the Telecommunications Act of 1996, by showing that they are providing workable, functioning OSS, the consumer will not enjoy the benefits of lower prices and enhanced quality that true local telephone competition promises to bring.

I wholeheartedly endorse the policy, theoretical and practical considerations which underlie the Commission's emphasis on the network platform. The Commission is right as a matter of policy, as a matter of antitrust law, and as a matter of interpretation under the Telecommunications Act. Everything the Commission has done to date in this respect has been laudable, appropriate and correct. But let me send a large red warning signal of real and impending danger that the Commission's arduous efforts will crumble and come to naught if the Commission does not help the industry and help consumers now by immediately coming to grips with the OSS issues, both for resale and for the all-important UNE platform.

This Commission should take immediate and meaningful action to douse the flames which threaten to consume the rights guaranteed and promises made to consumers and competitors alike in the Telecommunications Act of 1996.

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Ameritech.

Neil E. Cox
President

May 28, 1997

Ms. Anne K. Bingaman
Senior Vice President
President, Local Telecommunications Division
LCI International
8180 Greensboro Drive
McLean, Virginia 22101

Dear Anne:

As I indicated at our lunch, we are presently engaged in a two phase trial of the unbundled network platform with AT&T. The scope and timing of this trial is described in Dan Kocher's affidavit attached to our Section 271 application for Ameritech Michigan, now pending before the FCC, Docket 97-137. John Lenahan also conveyed to me his conversation with you this morning with respect to the interest you showed in participating or monitoring this operational trial.

Anne, to facilitate our continued progress, and to ensure that we meet the aggressive milestones of the AT&T test, I would encourage and support LCI's request to monitor the progress and results of our test with AT&T. Assuming it is agreeable to AT&T, Ameritech is willing to include LCI in this test as an observer, and to provide to LCI ongoing status reports and test results. Hopefully, this addresses your request to test the platform, without either side waiving our respective legal positions on "rebundling" or the meaning of "common transport".

If you would like to become involved, please convey Ameritech's willingness to include LCI as an observer to the existing platform trial, to Mr. William A. Davis II, AT&T Chief Regulatory Counsel - Central Region, at (312)230-2636.

If you have any questions or require additional information, please feel free to give me a call.

Sincerely,



Neil E. Cox

EX-15

LCI International®

Worldwide Telecommunications

Anne K. Bingaman
Senior Vice President
President, Local
Telecommunications Division

May 28, 1997

VIA FAX

Mr. Neil Cox
President
Ameritech Information Industry Services
350 North Orleans, Floor Three
Chicago, IL 60654

Dear Neil:

I received your three letters time-stamped 4:05 p.m. today. I had been out of office following the OSS Forum, and returned your call as soon as I came into the office, but missed you. I left my office and page numbers, and will be very happy to talk to you.

As to Mr. O'Sullivan, I appreciate your replacing him. I am sorry it came to this, but I can tell you that no one on my team was unhappy when they heard what I had done.

As to the AT&T test, we are glad to be included as an observer, but very much want and need to learn how to use the OSS processes supporting the platform ourselves. We reiterate our continuing request at the earliest possible time to be included as a test participant, not just as an observer, and to order up our Chicago and Grand Rapids or Detroit offices and friendly customers so that we can learn for ourselves the OSS procedures so important to the network platform.

I will tell you again that I am extremely disappointed in Ameritech's conduct as reflected by the actions of Ed Wynn, and I told Mr. Lenahan so following the Forum, as I did you in person last Thursday. The paper record between Mr. Wynn and me reflects a frustrating three months of meetings and letters in which Ameritech seemed to be clearly posturing for litigation, when it turns out that the test we sought was possible all the time.

To learn that it had been ongoing with AT&T, with no notice to us, and to learn it only as a result of your coming to Washington last Thursday, is just not the way a company like Ameritech should operate, particularly on something as critical to LCI as

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Mr. Neil Cox
May 28, 1997
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the operability of the network platform. Mr. Wynn and Dan Kocher were both in the meeting in Chicago on April 10, and they could and should have taken the same steps you have now much earlier. Had they done so, I would feel better about what has happened in our relationship with Ameritech in the last three months.

As to the report to you that I in some way personally attacked you the Forum, I am honestly baffled. To the very best of my recollection, I mentioned your name forthrightly simply as the individual who told me that Ameritech did not have the engineering personnel to conduct two network platform tests at the same time. That is and remains a simple statement of fact. I asked two of our staff who were there, who also were surprised that anything I said could be taken as an attack on you personally. One of them thought I might have mentioned your name a second time, but believed that if I did it was in the context of relating facts, not a personal attack. You should know, however, that I mentioned not just our experiences with Ameritech, but set forth in some detail our experience on several fronts with several of the other RBOCs as well, by name. I understood that to be the entire purpose of the Forum. Others on the panel did the same thing.

I feel absolutely no personal animosity whatsoever toward you, Neil, and cannot believe that I said something that constituted a personal attack of some kind against you. That does not mean that I am happy with Ameritech. As I have told you very frankly, both personally and in writing, LCI has had major problems dealing with Ameritech on a number of fronts. If in my discussion of our numerous problems with Ameritech something I said was misinterpreted as some kind of an attack on you, then I very much regret that and did not mean for it to be the case.

There will be a videotape and transcript of the entirety of the Forum, I am told, and I urge you to read the transcript and/or listen to the videotape and I will as well.

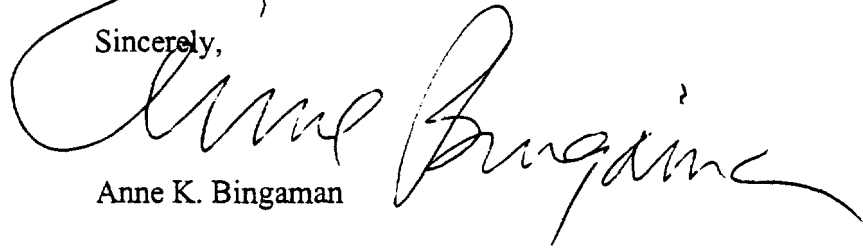
LCI fully intends to do everything on our side to make our business relationship work. More straight talk, such as you gave me on Thursday, and prompt follow-up, such as the other two letters from you today, and less posturing, such as we have had from Mr. Wynn, will go a long way to get and keep things on track. I appreciate your writing and again I appreciate the straight talk from you on Thursday. I only regret that it did not come sooner, and that I did not have to go to the very top of the company to get it.

I should note that LCI still needs resolution on the Ameritech USOC code issues discussed at length by me in the Forum today and detailed in my May 22 letter, and on the numerous other issues outlined in that letter as well. If we can get the kind of action on a wide variety of other issues which are reflected in your letters today, and continue to get the kind of straight talk which we finally got when you and I met last Thursday, I hope things can continue to improve.

Mr. Neil Cox
May 28, 1997
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Thank you for your three letters. I will be very happy to speak to you if you call.

Sincerely,

A large, elegant handwritten signature in cursive script, reading "Anne K. Bingaman". The signature is written in dark ink and is positioned to the right of the typed name.

Anne K. Bingaman

AKB:slg